

VOCA AND FVPSA DATA COLLECTION & REPORTING



10:00am (MDT) June 25, 2020

Presented by Karina Virrueta Running, Management & Data Consultant from Wisconsin, in collaboration with Sheena Gilbert, Idaho Council on Domestic Violence and Victim Assistance

PRESENTATION ROADMAP

1. VOCA/ FVPSA Overview
2. Why data is important. What has it done?
3. VOCA Performance Measurement Tool (PMT) question walk-through
4. FVPSA Performance Progress Report (PPR) question walk-through
5. Strategies/best practices
6. Questions



PRESENTATION ROADMAP

1. **VOCA/ FVPSA Overview**
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GRANT PURPOSES

Family Violence Prevention and Services Program (FVPSA)

Purpose: To support the establishment, maintenance and expansion of programs and projects to prevent incidents of family violence, domestic violence, and dating violence and to provide immediate shelter and supportive services for victims of family violence and their dependents that meet the needs of all victims, including those in underserved communities.

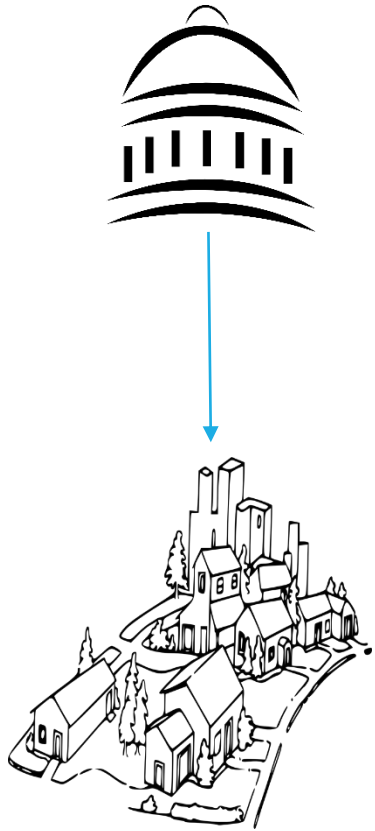
Victims of Crime Act (VOCA) Victim Assistance Grant Program

Purpose: To support the provision of direct victim services to victims of crime.

Direct services are efforts that:

1. Respond to the emotional, psychological, or physical needs of crime victims;
2. Assist victims to stabilize their lives after a victimization;
3. Assist victims to understand and participate in the criminal justice system; or
4. Restore a measure of safety and security for the victim.

OVERVIEW OF FVPSA & VOCA GRANT FUNDS



US Dept of Health & Human
Services & US Dept of Justice

Federal Administering Agencies

- **US HHS – FYSB:** Administers Family Violence Prevention & Services Act (FVPSA) funds through grant programs to states, territories, Tribes, and coalitions. FVPSA funds are statutorily appropriated to support an array of direct services and prevention efforts in order to intervene and prevent abuse.
- **US DOJ – OVC:** Administers and distributes Victims of Crime Act (VOCA) funds through victim assistance and compensation grant programs to states and territories. VOCA funds come from the Crime Victims Fund, which collects federal criminal fines, forfeited bail bonds, penalties, and special assessments.

Idaho Council on Domestic
Violence and Victim Assistance

Grantee/State Administering Agency (SAA)

• ICDVVA

- Receives FVPSA and VOCA grant funds from FYSB and OVC and is responsible for allocating them across the state.
- The intent is to support victim assistance and support efforts at the community level.

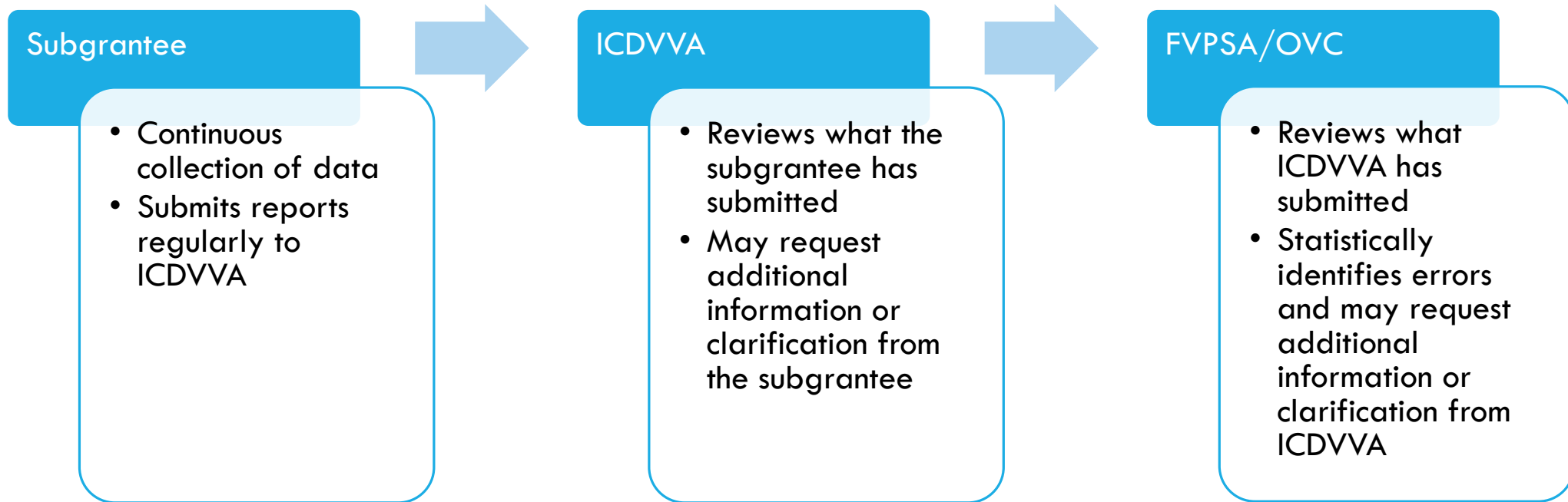
Service Providers

Sub-grantee

• You all!

- Service providers receive grant funds to provide critical services – from directly supporting victims to spreading awareness of the cause throughout the community.

GRANT DATA COLLECTION & REPORTING PROCESS



Subgrantee Role: To provide critical services – from directly supporting victims to spreading awareness of the cause throughout the community.

- Collect and report information needed on a regular basis
- Maintain documentation of individuals serviced and services provided that support the information you are reporting
- Clarify and update information in response to any inquiries from ICDVVA

PRESENTATION ROADMAP

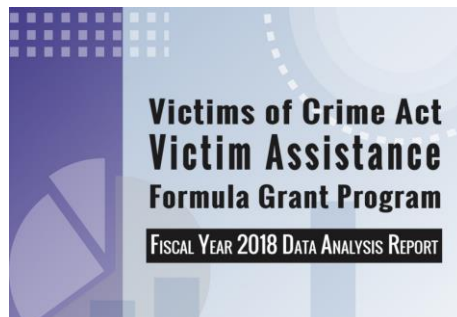
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GRANTS: WHY IS DATA IMPORTANT?



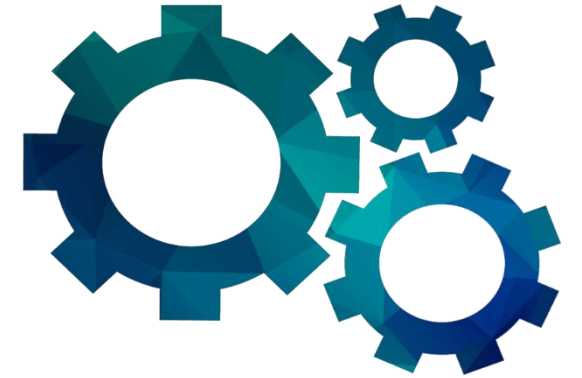
- **Performance Management:** They systematic use of strategic planning, goals, performance indicators, and analysis to improve the results of programs and effectiveness and efficiency of agency operations.
- **History:** Government and Performance Results Act (GPRA, 1993)
- **Philosophy:** Government funds → good governance
 - Accurate, fair, and comparable data to the state and its citizens regarding impact, quality, and efficiency of service delivery



Coalition Performance Progress Report
ACF-ACFY-FYSB-FVPS-PPR COVER PAGE
Family Violence Prevention and Services Program
Family and Youth Services Bureau/Administration for Children and Families
U.S. Department of Health and Human Services
Domestic Violence Coalition Grant Report

Example: Transitional housing, now a VOCA allowable service.

GRANTS: WHAT ELSE CAN DATA DO?

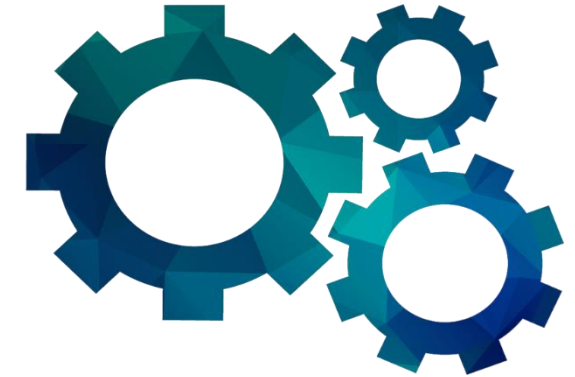


- Reporting for the sake of the grant? To satisfy a grant requirement?

~~Data is for grant reporting~~ → Data can be used for **program management & decisionmaking** with a goal of helping you to provide impactful services to victims/community

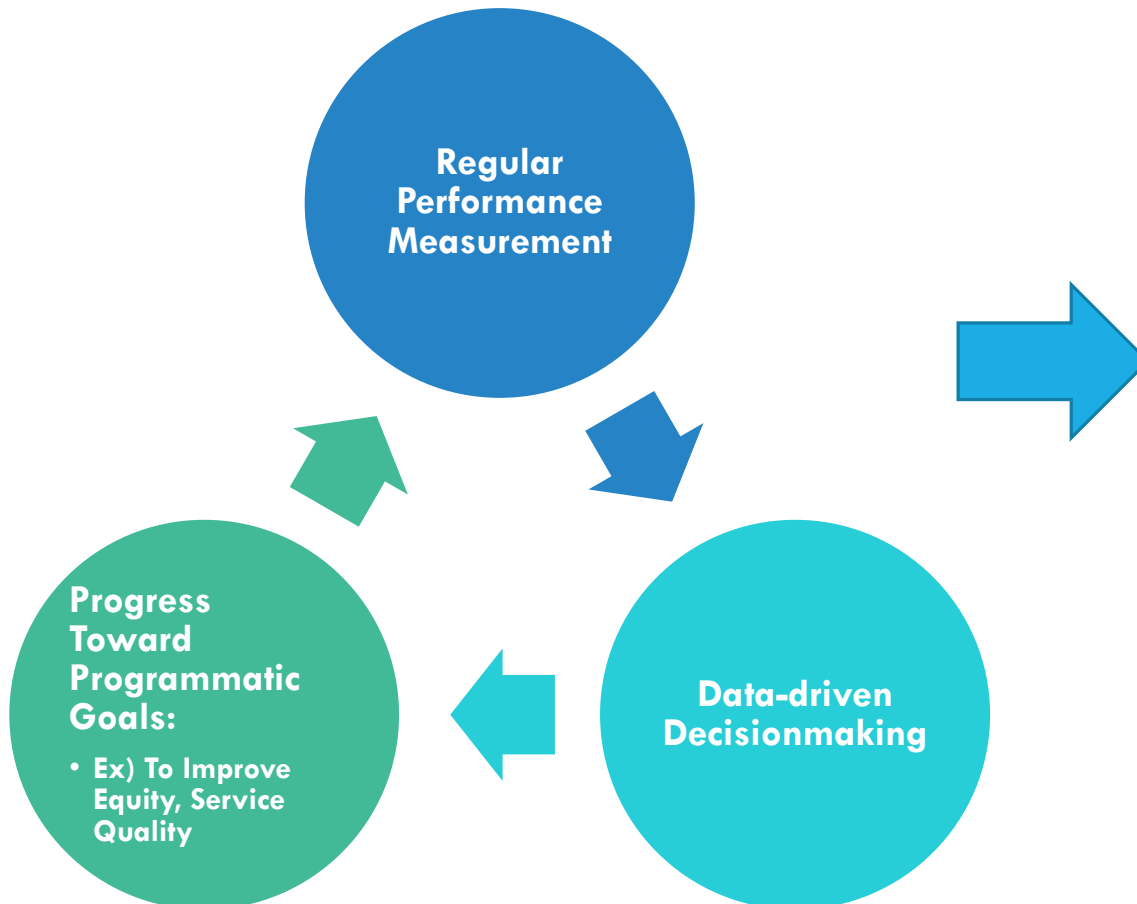
“Reporting is important to helping us understand trends and specific data that help us do our services well.”

GRANTS: WHAT ELSE CAN DATA DO?



Data can:

1. Help us to understand the impact of our efforts to end crime (FVPSA) and to bring justice and healing to victims (VOCA)
2. Demonstrate our capabilities and accountability to funders and the local community
3. Inform critical analysis of the crime victim movement and strengthen program practice, policy, and research



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OVC PERFORMANCE MEASUREMENT TOOL (PMT)

- **Reporting periods:** According to the State fiscal year:

State Fiscal Year	Federal Fiscal Year
Quarter 1: July 1 - September 30 Quarter 2: October 1 - December 31 Quarter 3: January 1 - March 31 Quarter 4: April 1 - June 30	Quarter 1: October 1 - December 31 Quarter 2: January 1 - March 31 Quarter 3: April 1 - June 30 Quarter 4: July 1 - September 30

- **Resources:**

- Definitions? **OVC Performance Measure Dictionary & Terminology Resource (Winter 2020)**
- Template? **Victim Assistance Subgrantee Data Template (October 2017)**
- Quick checklist? **VOCA Performance Measurement Tool Data Checklist (June 2020)**

OVC PERFORMANCE MEASUREMENT TOOL (PMT)

Purpose: Number of Individuals Served in a Reporting Period

Question 1	Total = New + Continuing Individuals Served
Question 2	
Question 3	

1. Total number of individuals who received services during the reporting period.

Instructions: Count all individuals served by your organization with the use of VOCA plus match funds during the reporting period. This number should be an unduplicated count of people served during a single reporting period, regardless of the number of services they received or victimization types with which they presented.

Total number of
individuals
receiving services

*

OVC PERFORMANCE MEASUREMENT TOOL (PMT)

Purpose: Number of Individuals Served in a Reporting Period

Question 1	Total = New + Continuing Individuals Served
Question 2	Total Anonymous Contacts
Question 3	

2. Total number of anonymous contacts received during the reporting period.

Instructions: Count all anonymous contacts received by your organization through a hotline, online chat, or other service where the individuality of each contact cannot be established. If your organization did not have any anonymous contacts, enter zero (0).

Total number of
anonymous
contacts *

OVC PERFORMANCE MEASUREMENT TOOL (PMT)

Purpose: Number of Individuals Served in a Reporting Period

Question 1	Total = New + Continuing Individuals Served
Question 2	Total Anonymous Contacts
Question 3	Total New Individuals Served*

3. Number of NEW individuals who received services from your agency for the first time during the reporting period.

Instructions: Report the number of NEW individuals served by your organization with the use of VOCA plus match funds for the first time during the reporting period. This number should be an unduplicated count of NEW clients served during a single reporting period, regardless of the number of services they received or victimization types with which they presented. **For the first reporting period of your subaward, all individuals should be counted as new.**

Total number of
NEW individuals
receiving services

*

***Are you unable to track new individuals distinctly from all individuals?**

Report “0” and **let your ICDVVA grant manager know.**

OVC PERFORMANCE MEASUREMENT TOOL (PMT)

Purpose: Number of Individuals Served in a Reporting Period

Question 1	Total = New + Continuing Individuals Served
Question 2	Total Anonymous Contacts
Question 3	Total New Individuals Served*

Before You Hit
Submit Quick Tips:

- ☐ Question 1 Total \geq Question 3 Total
- ☐ For quarter 1 reporting,
Question 1 = Question 3
- ☐ If cannot track NEW individuals, Question 3 is
“0” and **communicate with ICDVVA.**

OVC PERFORMANCE MEASUREMENT TOOL (PMT)

Q4 Purpose: Demographic Information for all **NEW** Individuals Served in a Reporting Period

4. Demographics (for NEW individuals identified in Question 3)

Instructions: Count each NEW individual in only one race/ethnicity type as self-reported. Individuals who self-report in more than one race and/or ethnicity category should be counted in the "Multiple Races" category. **The total number of individuals in each demographic category should equal the number of NEW individuals reported in Question 3.**

All "0" entries must represent a **true value of zero**.

If no data is collected for a **category**, enter "NT" in that category to mark it as Not Tracked. This means that the subgrantee is not yet able to submit data in this category due to the need to update its data collection system, but that efforts are underway to track data as requested. Then, in the "Not Tracked" category provided, report the number of individuals whose demographic data was not tracked.

If no data is collected for an **individual**, count that individual in the **Not Reported** category. This means that the subgrantee collects this data, but it was not provided by the person completing the intake form.

OVC PERFORMANCE MEASUREMENT TOOL (PMT)

Q4 Purpose: Demographic Information for all **NEW** Individuals Served in a Reporting Period

Important Reminders:

1. Information is self-reported.
2. There is a multiple races category.

Before You Hit Submit Quick Tips:

- ☐ Question 4 Total = Question 3 Total
- ☐ No demographic information? Count goes toward “Not Tracked”
- ☐ System cannot track a category? Use “NT” not “0”

OVC PERFORMANCE MEASUREMENT TOOL (PMT)

Q5A Purpose: Number of Individuals and Anonymous Contacts Served for by Victimization Type

5. Types of Victimizations (for ALL individuals identified in Questions 1 and 2)

Enter the count of individuals who received services based on each presenting victimization type during the reporting period.

Total must equal the number(s) reported in questions 1 and questions 2. However, the total can be greater than the number(s) reported in question 1 and question 2 if there is a victim or victims that presented with more than one type of victimization.

An individual MAY be counted in more than one victimization type.

An individual MAY NOT be counted more than once within the same victimization type.

**A. Individuals who
received services
by victimization
type: ***

	Number of Individuals who received services based on the presenting victimization during the reporting period
Adult Physical Assault (Includes Aggravated and Simple Assault)	
Adult Sexual Assault	

OVC PERFORMANCE MEASUREMENT TOOL (PMT)

Q5A Purpose: Number of Individuals and Anonymous Contacts Served for by Victimization Type

Before You Hit Submit Quick Tips:

- ☐ Q5A Total \geq Q1 Total + Q2 Total
- ☐ Victimization type is only selected once per individual and anonymous contact
- ☐ For “Hate Crimes” and “Other”:
 - ☐ If numeric field is filled, explanations are entered into the narrative field
 - ☐ If numeric field has “0,” “N/A” is entered into the narrative field
- ☐ The “Other” category is only used when no other type of victimization applies
- ☐ Attempted crimes or witnesses to crimes are categorized under that victimization type

OVC PERFORMANCE MEASUREMENT TOOL (PMT)

Q5B Purpose: Number of Individuals and Anonymous Contacts with more than One Victimization Type

B. Individuals
presented with
more than one type
of victimization
during reporting
period? *

Individuals with more than one
type of victimization

Of the individuals who received services, how many presented with more than one type
of victimization during the reporting period?

Before You Hit Submit Quick Tips:

❑ $Q1 \text{ Total} + Q2 \text{ Total} + \mathbf{Q5B \text{ Total}} \leq Q5A \text{ Total}$

OVC PERFORMANCE MEASUREMENT TOOL (PMT)

Q5C Purpose: Number of Individuals and Anonymous Contacts Special Classifications

C. Special Classifications *

	Special Classifications of individuals (Enter the number of individuals who identify in one or more of these categories)
Deaf/Hard of Hearing	<input type="text"/>
Homeless	<input type="text"/>
Immigrants/Refugees/Asylum Seekers	<input type="text"/>
LGBTQ	<input type="text"/>
Veterans	<input type="text"/>
Victims with Disabilities: Cognitive/Physical/Mental	<input type="text"/>
Victims with Limited English Proficiency	<input type="text"/>
Other	<input type="text"/>

OVC PERFORMANCE MEASUREMENT TOOL (PMT)

Q6 Purpose: Number of Individuals and Anonymous Contacts Provided Crime Victim Compensation Application Assistance

6. Number of individuals assisted with a victim compensation application during the reporting period:

Count the number of individuals who received assistance with completing a victim compensation application during the reporting period, even if they did not submit the application. Simply providing an individual with an application does NOT qualify as assistance.

OVC PERFORMANCE MEASUREMENT TOOL (PMT)

Q7 Purpose: Types of Services Provided by your Organization

Important Reminder:

1. Review definitions of the five categories of victim services & their associated subcategories (OVC Performance Measure Dictionary & Terminology Resource)

OVC PERFORMANCE MEASUREMENT TOOL (PMT)

Q8 Purpose: 1) Number of Individuals Served Receiving Services by Category AND 2) Number of Times Those Individuals were Provided Such Services

8. Total number of individuals who received services by service type AND number of times each service was provided during the reporting period:

Instructions: For each category (items A, B, C, D, and E), enter the **number of clients** who received services from your agency during the reporting period. For each subcategory within a category (e.g., items A1, A2, A3, and A4), enter **the number of times that service was provided** during the reporting period. Zero is a valid response.

Because some clients may receive multiple services, the total **number of times that services were provided** within a category may be greater than the **number of clients** who received those services.

OVC PERFORMANCE MEASUREMENT TOOL (PMT)

Q8 Purpose: 1) Number of Individuals and Anonymous Contacts Served by Service Category AND 2) Number of Times Those Individuals and Anonymous Contacts were Provided Such Services

8. Total number of individuals who received services by service type AND number of times each service was provided during the reporting period

A. Information & Referral

Enter the number of individuals who received services in this category

Enter the number of times services were provided in each subcategory.

A1. Information about the criminal justice process	60
A2. Information about victim rights, how to obtain notifications, etc.	125
A3. Referral to other victim service programs	25
A4. Referral to other services, supports, and resources (includes legal, medical, faith-based organizations, address confidentiality programs, etc.)	10

Total services: 220

OVC PERFORMANCE MEASUREMENT TOOL (PMT)

Q8 Purpose: 1) Number of Individuals and Anonymous Contacts Served by Service Category AND 2) Number of Times Those Individuals and Anonymous Contacts were Provided Such Services

Before You Hit Submit Quick Tips:

- ☐ Includes Q1 Total + Q2 Total
- ☐ Q8 Category Totals (“Number of individuals served in category”) \leq Question 1 + Question 2
- ☐ Q8 Category Totals (“Number of individuals served in the category”) \leq Sum of all Q8 Subcategories

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FVPSA PERFORMANCE PROGRESS REPORT (PPR)

- **Reporting periods:** According to the State fiscal year:

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- **Resources:**

- Definitions? **FVPSA Definitions (June 2020)**
- Data Tracking Template? **FVPSA Data Tracking Spreadsheet (June 2020)**
- Quick Checklist? **FVPSA Performance Progress Report Tool Data Checklist (June 2020)**

FVPSA PERFORMANCE PROGRESS REPORT (PPR)

Question 1A: Clients Served in Shelter

Number of Children/Youth	
Adults:	
Number of Women	
Number of Men	
Number Not-specified/Other	
Total	[Auto Sum]

1. People Served

A. Clients Served in Shelter

Instructions: Number of **NEW** domestic violence victims (clients) seen for the first time during this reporting period who received shelter services (including a shelter facility managed by the program, safe home or hotel). Clients should be counted once regardless of the number of times served during the fiscal year. For example, if a client spent 30 days in the shelter in November, exited the shelter and then came back to the shelter in March, then she would only be counted one time. Clients who received shelter should only be counted in this element and not counted in Clients Served with Non-Shelter Services even though they may have received non-shelter services also. Clients who were referred to another domestic violence shelter program should not be counted here. The count will be within program only and should not be unduplicated across programs statewide.

FVPSA PERFORMANCE PROGRESS REPORT (PPR)

Question 1B: Clients Served with Non-Shelter Services

Number of Children/Youth	
Adults:	
Number of Women	
Number of Men	
Number Not-specified Other	
Total	[Auto Sum]

B. Clients Served with Non-Shelter Services

Instructions: Number of **NEW** domestic violence victims (clients) seen for the first time during this reporting period who received only non-shelter services. Include only clients that received supportive services only and no shelter by your program. Calls to a crisis line or hotline should not be counted here and should be counted in Section C instead. Count should be within program only and not unduplicated across programs statewide.

FVPSA PERFORMANCE PROGRESS REPORT (PPR)

Question 1A: Clients Served in Shelter

Question 1B: Clients Served with Non-Shelter Services

Before You Hit
Submit Quick
Tips:



Only report **NEW Individuals
(children/youth, adult men, adult
women, unknown/other)**

FVPSA PERFORMANCE PROGRESS REPORT (PPR)

Question 2A: Race/Ethnicity

Black or African American	
American Indian/ Alaska Native	
Asian	
Hispanic or Latino	
Native Hawaiian/ Other Pacific Islander	
White	
Unknown/Other	

A. Race/Ethnicity

Report the race and/or ethnicity of the new clients served, including children and youth. Clients may self-identify in more than one category, e.g., White and Hispanic.

The total for race/ethnicity demographics must equal total reported in Question 1 (Clients Served in Shelter & Clients Served with Non-Shelter Services).

A1. *

Black or African American

A2. *

American Indian/Alaska Native

FVPSA PERFORMANCE PROGRESS REPORT (PPR)

Question 2B: Age

0-12	
13-17	
Unknown Child Age	
18-24	
25-59	
60+	
Unknown Adult Age	
Total	[Auto Sum]

B. Age

Report the ages fo the clients served, including children and youth.

The total for age demographics must equal total reported for Question 1 (Clients served in Shelter & Clients Served with Non-Shelter Services).

B1. *

0-12

B2. *

13-17

FVPSA PERFORMANCE PROGRESS REPORT (PPR)

Question 2C: Other Demographics

C. Other Demographics

Number of individuals needing language services, such as interpretation during the reporting period. Provision of interpretation and/or translation. Provision of English as a second language class. (count individuals one time) *

Number of individuals self-identifying as lesbian, gay, bisexual, transgender or queer (LGBTQ) during the reporting period. This is a count of clients who self-identify as lesbian, gay, bisexual, transgender or queer. (count individuals one time) *

Number of youth age 13-17 receiving services due to being a victim of dating violence during the reporting period. This is a count of all the youth age 13-17 receiving service due to being a victim of dating violence in their own relationships. These youths could be receiving services on their own, as an emancipated minor or other minor eligible to receive services, or could be a youth who accompanies their parent to shelter and self-identifies as needing their own services. (count individuals one time) *

FVPSA PERFORMANCE PROGRESS REPORT (PPR)

Question 2A: Race/Ethnicities

Question 2B: Age

Question 2C: Other Demographics

Before You Hit
Submit Quick
Tips:



- ☐ Report the self-identified race/ethnicity of clients served
 - ☐ May report more than one race/ethnicity
- ☐ Report age of clients served
- ☐ Report # of clients needs language services
- ☐ Report # of individuals identifying as LGBTQ
- ☐ Report # of individuals between age 13-17 who receive services due to dating violence

- ☐ These numbers should include children & youth

- ☐ **Total for Q 2A Q 2B must equal the sum of Q1A + Q1B**

FVPSA PERFORMANCE PROGRESS REPORT (PPR)

Question 3: Shelter Services and Crisis Calls

3. SHELTER SERVICES AND CRISIS CALLS

Number of Shelter Nights. Indicate the number of shelter nights for each person who arrives and is provided a bed, including onsite shelter, safe home or hotel room. Include victims of domestic violence and their dependents. Count the number of people housed times the number of nights. For example, a victim and her 3 children stay in the shelter or safe house for 5 nights; this means 4 people x 5 nights = 20 shelter nights. (Shelter includes onsite shelter managed by the domestic violence program, program-sponsored hotel rooms and safe homes (residences of volunteers who offer their private homes for short-term crisis situations) or other temporary housing that your program manages. Nights that a victim stays in a shelter not managed by your program should not be counted). *

Number of Unmet Requests for Shelter. Count the number of unmet requests for shelter due to program shelter, safe homes or sponsored hotel rooms being at capacity or unavailable. Count adult victims of domestic violence only. This count SHOULD NOT include individuals who were not served because their needs were inappropriate for the services of your program, e.g., homelessness not related to domestic violence. Count the total number of times requests for shelter were declined, even if the program provided other services. *

Number of Crisis/Hotline Calls. Calls received on any agency line that relate to an individual or family in need of some kind of service. A program does not have to have a dedicated hotline to count these calls. Count all calls including repeat callers and calls from third parties such as a family member. DO NOT count calls about donations or for general information about program or violence issues unrelated to a specific individual or family, calls from the media, etc. *

FVPSA PERFORMANCE PROGRESS REPORT (PPR)

Question 3: Shelter Services & Crisis Calls

Before You Hit
Submit Quick
Tips:



- ☐ **Shelter Nights:**
 - ☐ Include the adults and their dependents
 - ☐ Count the # of people multiplied by the number of nights
- ☐ **Unmet Requests for Shelter:**
 - ☐ Count adults only
 - ☐ DO NOT count individuals who were not served because their needs were inappropriate for the services offered by your program
- ☐ **Crisis/Hotline Calls:**
 - ☐ Count the # of calls received on any agency line relating to an individual or family needing some kind of service
 - ☐ Don't have to have a dedicated hotline to count these calls
 - ☐ Count repeat callers and third party callers (e.g., family members)

FVPSA PERFORMANCE PROGRESS REPORT (PPR)

Question 4A: Number of Children/Youth Receiving Crisis Intervention

Question 4B: Number of Children/Youth Receiving Victim Advocacy Services

Question 4C: Number of Children/Youth Receiving Individual or Group Counseling/Support Group

Question 4D: Number of Adult Victims Receiving Crisis Intervention

Question 4E: Number of Adult Victims Receiving Victim Advocacy Services

Question 4F: Number of Adult Victims Receiving Individual or Group Counseling/Support Group

Question 4G: Number of Adult Victims Receiving Criminal/Civil Legal Advocacy

Question 4H: Number of Adult Victims Receiving Medical Accompaniment

Question 4I: Number of Adult Victims Receiving Transportation Services

**Before You Hit
Submit Quick
Tips:**



- ☐ Report the # of clients who received each service
- ☐ Count each individual only once for each type of service

FVPSA PERFORMANCE PROGRESS REPORT (PPR)

Question 5A: Community Education – Adults/General Population

Number of Presentations	
Number of Participants	

Question 5B: Community Education – Youth Targeted Education

Number of Presentations	
Number of Participants	

A. Adults/General Population: (Count the total number of presentations or training's about domestic violence and/or services related to victims of domestic violence and their children. In addition, count the number of individuals in attendance. Some examples may be a training for health professionals or workshop for tribal leaders. Include all presentations for a mixed-age audience. This number does not include health fairs, media interviews or advertising). *

Number of Presentations

*

Number of Participants

B. Youth Targeting Education: (Count the total number of presentations or training's about domestic violence, dating violence, healthy relationships or available services for victims. In addition, count the number of individuals in attendance. Some examples may be a presentation to youth in school on healthy relationships or a workshop for youth at a Safety Day event). *

Number of Presentations

*

Number of Participants

FVPSA PERFORMANCE PROGRESS REPORT (PPR)

Question 6: Service Outcome Data

Question 1: I know more about community resources

A. Number of Surveys completed for:

1. *

Shelter Safety

2. *

Support Services and Advocacy Survey

3. *

Counseling Survey

4. *

Support Group Survey

FVPSA PERFORMANCE PROGRESS REPORT (PPR)

Question 6: Service Outcome Data

Before You Hit
Submit Quick
Tips:



- ☐ Collect outcome information for each service:
 - ☐ Shelter
 - ☐ Support services & Advocacy
 - ☐ Counseling
 - ☐ Support group
- ☐ **At a minimum, FVPSA requests outcome information on shelter services from programs that provide shelter services**
- ☐ Count the # of surveys completed and the # of YES responses to each question
- ☐ Two mandated questions that must be asked:
 - ☐ Because of the services I received:
 - ☐ **I know more about community resources (yes or no)**
 - ☐ **I know more ways to plan for my safety (yes or no)**

FVPSA PERFORMANCE PROGRESS REPORT (PPR)

Question 7: Total Domestic Violence Program Budget

Before You Hit
Submit Quick
Tips:



- ☐ This is the sum of your total annual budget
- ☐ Report ALL funding sources

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DATA BEST PRACTICES

- 1. Think big picture: Consider shifting your organizational culture to a data-driven decisionmaking organization**
 - Consider strategic planning, development of programmatic goals, and regular meetings where data is discussed amongst staff
- 2. Communicate regularly with staff. Specifically, discuss:**
 - Data collection/reporting roles, expectations, updates/changes, best practices, timelines
 - Data elements including questions asked, demographic terminology, service definitions, etc.
 - Walk through client-data scenarios regularly with staff
 - Results of your data collection
- 3. Document the details & create resources. Create an internal resource for data collection and reporting:**
 - How will you collect your data?
 - ICDVVA spreadsheet/report
 - Excel spreadsheet
 - System
 - Word document/pen & paper
 - How will data be collected and then entered?
 - Multiple staff collecting and entering data
 - One staff collecting and entering data
 - Multiple staff collecting and entering data, one entering it
 - How will data be verified?
 - What is considered back-up documentation? (Audits – this is important!)
 - Whose role is it to clean the data?
 - Give examples, create scenarios

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